

Plaintiffs' Exhibit 96

30(b)(6) Deposition Notes (6/2/2022)

What did I do for preparation?

- ~38 hours of meetings; 10 sessions; over 4 weeks.
- 10 hours of reviewing documents.
- Who did I speak with?
 - Data Science: Maggie Ji; Gerardo Zaragoza regarding Hive and TAO.
 - FTech: Oriana Torres and Ricardo Brums regarding retention of unstructured data (e.g., GSuite; Dropbox; Quip; internal tools)
 - CM: Jennifer Allen regarding the legal hold notice for this case.
 - InfoGov: Yodi Hailemariam regarding corporate policies including FTCO & US Privacy Program records management policies.
 - Mayur Patel: Software engineer on Privacy team. Discussions regarding TAO.

Information Governance: Responsible for risk assessment, and also responsible for legal and regulatory compliance of Company records. Global Records Management within InfoGov team is responsible for establishing, implementing and managing policies and procedures regarding creation, use, retention and disposition of Company Records.

Records: A Record is recorded information that:

- Is created, received or maintained by an Facebook Personnel in that person's business capacity;
- Relates to Facebook or its business;
- Is in the possession, custody, or control of Facebook; and
- Is subject to legal or regulatory retention requirements or that is necessary for the operation of the business.

Cambridge Analytica Legal Hold: 469 total custodians on hold as of 5/31/2022.

- Six different versions of legal hold notice.
- First issued in March 22, 2018. 134 custodians received the original notice.
 - Describes the matter and to not discuss the hold with anyone outside of in-house counsel.
 - Instructs the custodian to preserve all relevant information; do not delete anything subject to legal hold. Save existing documents if unsure a document is relevant. Save all new documents relevant to the matter. Asks to help identify any potential new custodians by notifying the legal team. Custodians are instructed to inform the legal team if they become aware of relevant ESI being destroyed, deleted or changed.
 - Data Source summary with examples, but not limited to these examples.
 - Topics related to the matter subject to preservation.
- Second issued March 28, 2018. 169 custodians on hold as of this date.
 - Expanded relevant topic examples.

- Third issued May 24, 2018. 330 custodians on hold as of this date.
 - Scope and description of matter is updated.
 - Expanded relevant topic examples.
- Fourth issued July 2, 2018. 341 custodians on hold as of this date.
 - Scope and description of matter is updated.
 - Expanded relevant topic examples.
- Fifth issued June 16, 2020. 392 custodians on hold as of this date.
 - Scope and description of matter is updated. Added a date range (2007-Present).
 - Added example of a data source that falls within the hold.
 - Expanded relevant topic examples.
 - Actions: Suspend auto-deletion routine; when in doubt err on side of preservation; notify eDiscovery if you plan to leave or get a new device. Implemented legal hold acknowledgments.
- Sixth issued December 3, 2021. 421 custodians on hold as of this date.
 - Reference ephemeral messaging (do not use it or take steps to preserve).

DYI: Currently eight named plaintiffs. Did not receive UID, email, or phone number for named plaintiffs until Dec. 2019 – Jan. 2020.

- Information that FB has about its users in human readable form.
- Pulls information from a dynamic dataset (including TAO).
- User generated data; some observed data; some derived data.

Steve Akins	User Accounts: Jan 23, 2020; March 15, 2022; April 16, 2022 Pages (Admin Only): N/A
Jason Ariciu	User Accounts: Jan 23, 2020; March 15, 2022; April 16, 2022 Pages (Admin Only): Dec. 23, 2021; Jan. 4, 2022
Anthony Bell	User Accounts: Jan 23, 2020; March 15, 2022; April 16, 2022 Pages (Admin Only): Oct. 26, 2021
Bridgett Burke (2 accounts)	User Accounts: Jan 23, 2020; Oct. 6, 2021 (second account); March 15, 2022; April 16, 2022 Pages (Admin Only): N/A
Terry Fischer	User Accounts: Jan 23, 2020; April 20, 2020; March 15, 2022; April 16, 2022 Pages (Admin Only): N/A
Tyler King (deleted account 2018)	User Accounts: March 15, 2022 (nothing available as of this date) Pages (Admin Only): N/A
Jordan O'Hara	User Accounts: Jan 23, 2020; March 15, 2022; April 16, 2022 Pages (Admin Only): Oct. 26, 2021
Cheryl Senko	User Accounts: Jan 23, 2020; March 15, 2022; April 16, 2022 Pages (Admin Only): Nov. 23, 2021

TAO (The Associations & Objects): TAO is information contained within Facebook's production systems. Relationship between users (objects). Data is pulled from Production system. We do not have tools to suspend users from making changes. DYI / Switchboard takes a snapshot.

- Objects & Associations once in TAO, but are no longer there? Potentially. TAO creates the user experience. It is a live production system. Facebook does not have a tool to prevent users from interacting with the product.
- How User Generated Content gets removed from TAO? Example: User deletion.
- Facebook can remove objects and associations. Example: If a user blocks a friend.
 - Facebook deprecates products and features, and objects and associations would be deleted when this happens.
 - Preserved if snapshot prior to deprecation of product or feature
 - Preserved if data captured in Hive placed on legal hold.
 - Updated data overwrites existing data. Derived data is information FB creates about a user. For example: Content that you view and like which changes over time.
 - What has FB done to maintain Objects & Associations?
 - DYI & Switchboard at the particular time the snapshot is taken.
 - Not all observed or derived data is captured in these snapshots.
 - Facebook does not have a tool to freeze TAO data.

Switchboard: Has more information about other users (compared to DYI). It also has information related to Pages, Groups, Advertising accounts.

Steve Akins	User Accounts: March 9, 2020
Jason Ariciu	User Accounts: March 9, 2020
Anthony Bell	User Accounts: March 9, 2020
Bridgett Burke (2 accounts)	User Accounts: March 9, 2020; Sept. 27, 2021 (second account)
Terry Fischer	User Accounts: March 9, 2020
Tyler King (deleted account 2018)	User Accounts: March 9, 2020 Attempted to take Switchboard / DYI snapshots but data was no longer available.
Jordan O'Hara	User Accounts: March 9, 2020
Cheryl Senko	User Accounts: March 9, 2020

Note: In the aggregate, FB preserved 52 Switchboard snapshots across Groups, Pages, Ads Accounts in Fall 2021 for the named plaintiffs when identified as Admins.

Data Science:

- Hive:
 - What is Hive: Data warehouse. Captures and stores data about it's products and services / user activity for analytics purposes. Large data sets. Non-human readable format.
 - ~20 million tables in Hive
 - Data scientists / engineers have to create the hive table. Hive is the framework that allows teams to use the data for whatever business purpose.
 - Retention Policy: Every Hive table has a retention period. Table owner sets the retention period. There's no default time period.

- Partitions: Discrete part of the Hive table. For instance, by date.
- UII – 90 days maximum. Longer than 90 days UII has to be deleted (RID replaces UID). The table owner is responsible for identifying UII but there are built-in tools that assist with this identification.
- Hive on hold: Legal hold setting; eDiscovery is the only team who has ability to put Hive data on legal hold.
 - Stops partitions from being deleted or modified. Archived into a secured area in cold storage.
 - Suspends any changes to the data.
 - iData: Allows searching for Hive tables and indicates if table is on hold.
 - Teams are informed about a Hive table on hold.
- 137 Hive tables on legal hold.

Deprecated Systems: Facebook's practice regarding deprecated systems is to transfer data from the deprecated system to the new system. Only storage system scheduled to be deprecated is Everstore which stores large files (e.g., Photos; Videos). Manifold is the new storage system and data is being migrated from Everstore to Manifold. Not aware of any other deprecated systems containing plaintiff data.